

JP:AEL

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

JUANA DE LOS SANTOS,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

Gregory Stemkowski, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 24, 2012, within the Eastern District of New York and elsewhere, defendant JUANA DE LOS SANTOS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

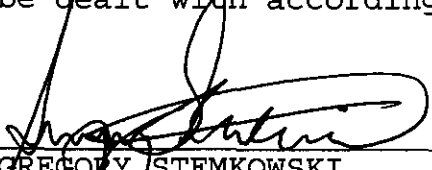
1. On or about June 24, 2012, JUANA DE LOS SANTOS arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Jet Blue Airlines Flight No. 826 from the Dominican Republic.

2. Defendant JUANA DE LOS SANTOS was selected for a Customs and Border Protection ("CBP") examination. She presented a blue Charlie sport bag for inspection. The defendant admitted ownership of this bag and its contents. Inside the blue Charlie sport bag were two other bags: a black Velez bag and a blue Toto pocketbook. Both of these bags were empty, but unusually heavy. A probe of these bags revealed packages concealed within the liner of the bags, which contained a brown, powdery substance that field-tested positive for the presence of heroin. The defendant was placed under arrest.

3. The total approximate gross weight of the heroin found in defendant JUANA DE LOS SANTOS' suitcases is 3,816 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant JUANA DE LOS SANTOS be dealt with according to law.



GREGORY STEMKOWSKI
Special Agent
HSI

Sworn to before me this
25th day of June, 2012

JGE